Regarding RM-10869, a petition by Ronald D Lowrance "to enhance the requirement for knowledge and proficiency of Morse code as a key component of Amateur licensing."

The petitioner's comments are not compelling. Yes, Morse code can be used under conditions where SSB voice cannot, but digital modes can exist that are far more resistant to poor signal quality. For example, correlation can be used to distinguish a signal that is below the background noise, as in the GPS system. The same methods can be used with Morse -- for example, using a dit of 30 seconds and a dah of 90 seconds, a computer can receive a Morse Code signal that the human ear cannot even detect. Even simpler digital methods using Forward Error Correction are more reliable than Morse code at comparable data rates. (The fact that AX.25 is not a very good protocol is not an argument for Morse code as much as it is an argument for better digital protocols.)

His arguments regarding leadership add nothing to the case for Morse code. I agree with his point that the United States should set an example for the world – I just disagree with the idea that we do it by embracing obsolete technology.

I also agree that the Amateur Radio community may at times play a valuable role in Homeland Security. But the question of Morse code raises two possibilities:

- 1. You have fewer radio amateurs, some number of which know Morse code. I assume that people who do not find Morse code fascinating will not choose to use that mode regularly, and therefore their Morse skill will deteriorate to uselessness.
- 2. You have more radio amateurs, some number of which know Morse code. I assume that some people will continue to find CW to be an interesting mode (as is demonstrated by the current crowding in the CW bands) and therefore will learn it and use it anyway. You will also find that some people who do not share that interest will enter the hobby and therefore be licensed, have equipment, and have familiarity with operating procedures in the event that they are needed.

I personally fall into that last group. About 25 years ago, I gave up on Amateur radio because of Morse code. I did not have a natural aptitude for Morse code, and I saw that the license structure at the time would have required me to exert an enormous amount of work to become proficient in Morse code before I could begin to explore my real interests. I turned to computers instead.

I considered getting a Technician license when the code requirement was dropped in the early 1990's, but I was at a different point in my life at the time.

More recently, I have become interested in sailing boats offshore, and subsequently have reconsidered an Amateur license for HF communications. I find that Morse code is still just as hard as it was 25 years ago, but I am even less likely to want to use it than I was back then. It is a skill to learn, pass the test, and then forget.

Perhaps the Amateur Radio service is better off without people like me, but I don't think my lack of Morse code proficiency is such a serious drawback that I cannot make contributions in other areas.

The petitioner's argument is effectively that you should judge Morse code to be so important that it is better to exclude people who do not have that skill from the Amateur Radio service. In that case, it would seem important to be sure that those who are not excluded can actually make use of the skill when called upon. That suggests two requirements that go further than the petitioner's explicit statement:

First, it seems you should require regular re-examination to demonstrate that the licensee still has the skill. If someone passed the test 5 years ago and has not sent or received one character of Morse code since, then you have not achieved the goal of ensuring that all radio amateurs have the skill in the event of an emergency. Their skill has likely deteriorated. Retesting will ensure that people keep their skill current, and give you the opportunity to revoke the licenses of those who no longer have this "essential" skill.

Second, it is pointless to require a skill that cannot be used for lack of equipment. If Morse code capability is fundamentally important to Homeland Security, then each radio amateur must possess the necessary hardware. For example, many 2 meter FM handhelds are hardly suitable for CW operation. Amateurs found to not possess CW equipment for the designated bands would have their licenses revoked. After all, if the capability is that important, it doesn't matter if you fail for lack of skill or fail for lack of suitable equipment – in either case, you cannot make use of Morse code when called upon in an emergency.

I present these ideas partly to demonstrate the weakness of the arguments in the petition (reductio ad absurdum) and partly to demonstrate the logical (but unstated) conclusions that should be obvious if the arguments are valid.

In fact, I think a better choice is to eliminate the Morse code requirement completely for all classes of license. I will not go so far as to predict a big increase in the number of radio amateurs, but it removes an obstacle that many (though not all) agree is pointless.

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